



**U.S. Department of Justice**

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March 21, 2024

**Via ECF**

Hon. Cathy L. Waldor, U.S.M.J.  
United States District Court  
Martin Luther King Bldg. & U.S. Courthouse  
50 Walnut Street  
Newark, NJ 07102

**SO ORDERED.**

**s/ Cathy L. Waldor**  
**Hon. Cathy L. Waldor, U.S.M.J.**

**Date: March 22, 2024**

**Re: *Pergament & Cepeda LLP v. SBA*, Civil Action No. 23-cv-21632  
30-Day Extension Request of Answer Deadline with Consent**

Dear Judge Waldor:

This Office represents the U.S. Small Business Administration (“SBA”) in the above-referenced matter involving SBA’s acceleration of an Economic Injury Disaster Loan issued to Plaintiffs. We write with the consent of Plaintiffs’ counsel to respectfully request a 30-day extension of SBA’s time answer, move, or otherwise respond to the complaint. Our current answer deadline is March 22. If the Court grants our request, our new deadline would be April 22. This is our second extension request, as we previously obtained a two-week Clerk’s extension under Local Civil Rule 6.1(b).

Good cause exists to grant this extension request because SBA is actively considering whether the parties can resolve this case without discovery but needs additional time to consider its options for resolution.

If this proposal is acceptable to Your Honor, we respectfully request that you “so order” this letter and have the Clerk’s Office file it on the docket. Thank you very much for your consideration of this request.

Respectfully submitted,

PHILIP R. SELLINGER  
United States Attorney

By: /s/ John F. Basiak Jr.  
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cc: Avi Frisch (counsel for Plaintiffs)